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EXHIBIT A

Counsel for Defendant GONZALEZ-NAVARRO

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 14-00140 RMW
)	
Plaintiff,)	STIPULATION AND []
)	ORDER CONTINUING HEARING TO
vs.)	JULY 43, 2014, AND EXCLUDING TIME
)	UNDER THE SPEEDY TRIAL ACT
FELIPE DE JESUS GONZALEZ-)	
NAVARRO,)	
)	
Defendants.)	

STIPULATION

The defendant and the government, acting through their respective counsel, hereby stipulate, subject to the Court's approval, that the status hearing date currently set for June 16, 2014, be vacated and continued to July 43, 2014, at 9:00 a.m.

The reason for the requested continuance is defense counsel will be unavailable on June 16, 2014, the date now set for a further status in this matter. Defense counsel will be out of the district attending a two week seminar. The parties anticipate Mr. Gonzalez-Navarro will enter a change of plea at the July 43, 2014, status date and requests immediate sentencing. However, the proposed disposition still requires supervisory approval from within the U.S. Attorney's

1 Office. The parties therefore respectfully request a continuance and exclusion of time based on
2 the parties' need to effectively prepare and continuity of counsel.

3 Accordingly, the parties agree and stipulate that time should be excluded from June 16,
4 2014, through and including July 43, 2014, under the Speedy Trial Act, 18 U.S.C. §
5 3161(h)(7)(A) and (B)(iv), for effective preparation and continuity of counsel. The defendant
6 and the government further agree that granting the requested exclusion of time will serve the
7 interest of justice and the ends of justice outweigh the interest of the public and the defendant in
8 a speedy trial.

9 IT IS SO STIPULATED.

10 Dated: June 13, 2014 _____/s/_____
11 VARELL L. FULLER
Assistant Federal Public Defender

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13 Dated: June 13, 2014 _____/s/_____
14 PHILIP KOPCZYNSKI
Special Assistant United States Attorney

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20 **[] ORDER**

21 GOOD CAUSE APPEARING, upon stipulation of the parties, IT IS HEREBY
22 ORDERED that the status hearing currently set for June 16, 2014, shall be continued to July 43,
23 2014, at 9:00 a.m.

24 THE COURT FINDS that failing to exclude the time between June 16, 2014, and July
25 43, 2014, would unreasonably deny both parties the reasonable time necessary for effective
26 preparation, taking into account the exercise of due diligence, and deny the defendant continuity

1 of counsel. See 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

2 THE COURT FURTHER FINDS that the ends of justice served by excluding the time
3 between June 16, 2014, and July 43, 2014, from computation under the Speedy Trial Act
4 outweigh the interests of the public and the defendants in a speedy trial.

5 THEREFORE, IT IS HEREBY ORDERED that the time between June 16, 2014, and
6 July 43, 2014, shall be excluded from computation under the Speedy Trial Act, 18 U.S.C. §
7 3161(h)(7)(A) and (h)(7)(B)(iv).

8
9 IT IS SO ORDERED.

10 Dated: ~~1~~ ~~1~~ ~~1~~


THE HONORABLE RONALD M. WHYTE
United States District Court Judge